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INSURANCE COMPANY

10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA
12

13 LIBERTY MUTUAL FIRE INSURANCE
14 COMPANY,

15 Plaintiff,

16 v.

17 ACUITY A MUTUAL INSURANCE
18 COMPANY and ROYAL REFRIGERATION,
INC.,

19 Defendants.

Case No. 2:24-cv-00684-JAD-DJA

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE RESPONSES
TO PLAINTIFF LIBERTY MUTUAL
FIRE INSURANCE COMPANY'S
MOTION FOR SUMMARY JUDGMENT
[DOC. 20] AND DEFENDANT ACUITY
INSURANCE'S MOTION FOR
SUMMARY JUDGMENT [DOC. 24]**

[FIRST REQUEST]

20
21 Pursuant to LR IA 6-1, Plaintiff Liberty Mutual Fire Insurance Company ("LIBERTY
22 MUTUAL") and Defendant Acuity A Mutual Insurance Company ("ACUITY"), by and through
23 their counsel of record, hereby submit to this Honorable Court this stipulation and request to extend
24 the time for both parties to file responses to Plaintiff Liberty Mutual Fire Insurance Company's
25 Motion for Summary Judgment [Doc. 20] (filed on February 13, 2025) and Defendant Acuity
26 Insurance's Motion for Summary Judgment [Doc. 24] (filed on February 14, 2025). The current
27 due date for the responses are March 6, 2025 and March 7, 2025. The proposed new due date would
28 be March 12, 2025 for both responses.

Case No. 2:24-cv-00684-JAD-DJA

STIPULATION TO EXTEND TIME TO FILE RESPONSES TO PLAINTIFF LIBERTY MUTUAL FIRE
INSURANCE COMPANY'S MOTION FOR SUMMARY JUDGMENT [DOC. 20] AND DEFENDANT ACUITY
INSURANCE'S MOTION FOR SUMMARY JUDGMENT [DOC. 24]

1 The parties respectfully submit that good cause exists for this stipulation based on the
2 following:

3 1. This is the parties' first request for an extension. Given the complexity of the legal
4 issues the parties mutually wish to fully and comprehensively brief the issues at hand for the Court
5 and submit that an extension of three/four business days will help accomplish that aim.

6 2. The Parties have agreed to stipulate to this extension.

7 3. This request is made in good faith and without intent to cause undue delay.

8 4. In accordance with LR IA 6-1, this is the first request for an extension of time to file
9 oppositions to Plaintiff Liberty Mutual Fire Insurance Company's Motion for Summary Judgment
10 [Doc. 20] and Defendant Acuity Insurance's Motion for Summary Judgment [Doc. 24].

11 DATED this 5th day of March, 2025

12 McCORMICK, BARSTOW, SHEPPARD,
13 WAYTE & CARRUTH LLP

14 By /s/Jonathan W. Carlson
15 JONATHAN W. CARLSON, ESQ.
16 Nevada Bar No. 10536
17 Attorneys for Plaintiff

18 DATED this 5th day of March, 2025

19 RESNICK & LOUIS, PC

20 By /s/Gary R. Guelker
21 GARY R. GUELKER, ESQ.
22 Nevada Bar No. 10603
23 Attorneys for Defendant ACUITY A MUTUAL
24 INSURANCE

25 Based on the parties' stipulation [ECF No. 25] and with good cause appearing, IT IS
26 ORDERED that the deadlines to file responses to Plaintiff Liberty Mutual Fire Insurance
27 Company's Motion for Summary Judgment [Doc. 20] and Defendant Acuity Insurance's Motion
28 for Summary Judgment [Doc. 24] are extended up to and including March 12, 2025.

UNITED STATES DISTRICT COURT JUDGE

11315905.1